

BRIEN J. FARRELL, City Attorney (SBN 088318)  
CAROLINE L. FOWLER, Assistant City Attorney (SBN 110313)  
City of Santa Rosa  
100 Santa Rosa Avenue, Room 8  
Santa Rosa, California 95404

Telephone: (707) 543-3040  
Facsimile: (707) 543-3055

Attorneys for Defendants  
CITY OF SANTA ROSA; EDWIN FLINT, in his capacity  
as Chief of Police for the CITY OF SANTA ROSA;  
RICH CELLI, an individual and Officer of the  
SANTA ROSA POLICE DEPARTMENT; TRAVIS MENKE,  
an individual and Officer of the SANTA ROSA POLICE DEPARTMENT;  
PATRICIA MANN, an individual and Officer of the  
SANTA ROSA POLICE DEPARTMENT; and JERRY SOARES,  
an individual and Officer of the SANTA ROSA POLICE DEPARTMENT

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

PATRICIA DESANTIS, individually and as  
Successor in Interest for RICHARD  
DESANTIS, deceased, and as Guardian ad  
Litem for DANI DESANTIS, a minor,

Case No. C 07-3386 JSW

Plaintiffs,

**STIPULATION AND ORDER FOR  
CONSOLIDATION OF ACTIONS**

v.

CITY OF SANTA ROSA, JERRY  
SOARES, RICH CELLI, TRAVIS MENKE,  
PATRICIA MANN, et al.

Defendants.

ADRIANNE DESANTIS,

Case No. C 07-4474 JSW

Plaintiff,

v.

CITY OF SANTA ROSA, a municipal  
corporation, EDWIN FLINT, in his capacity  
as Chief of Police for the CITY OF SANTA  
ROSA; PATRICIA MANN, individually  
and in her capacity as an officer for the  
CITY OF SANTA ROSA; RICH CELLI,  
individually and in his capacity as an officer  
for the CITY OF SANTA ROSA; TRAVIS  
MENKE, individually and in his capacity as

1 an officer for the CITY OF SANTA ROSA,  
2 et al.,

3 Defendants.  
4 \_\_\_\_\_ /

5 IT IS HEREBY STIPULATED AND AGREED by and between the parties to the above-  
6 entitled actions, by their respective counsel, as follows:

7 1. The above-entitled actions, *Patricia DeSantis, et al. v. City of Santa Rosa, et al.*,  
8 and *Adrianne DeSantis v. City of Santa Rosa, et al.*, arise out of the same incident and involve  
9 common issues of law and fact; and

10 2. The parties agree that in the interests of judicial economy, the two cases should be  
11 consolidated for all purposes, including trial.

12 The undersigned hereby jointly apply to the court for an order consolidating Action No.  
13 C 07-3386 JSW with Action No. C 07-4474 JSW and directing that only one set of findings of  
14 fact and conclusions of law, if any, and one judgment be made, that the original of all further  
15 papers filed in the above-entitled actions be entitled *Patricia DeSantis, et al. v. City of Santa*  
16 *Rosa, et al.*, and filed in Action No. C 07-3386 JSW, and that a copy of such order be filed in  
17 Action No. C 07-4474 JSW, but that no further papers or documents or copies thereof need be  
18 filed in that action.

19 Dated: 1/2/08 \_\_\_\_\_

20 /s/  
21 JOHN HOUSTON SCOTT, ESQ.  
22 Attorney for Plaintiffs  
23 PATRICIA DESANTIS, et al.

24 Dated: 1/3/08 \_\_\_\_\_

25 /s/  
26 ERIC SAFIRE, ESQ.  
27 Attorney for Plaintiffs  
28 PATRICIA DESANTIS, et al.

29 Dated: 1/3/08 \_\_\_\_\_

30 /s/  
31 BEN NISENBAUM  
32 Attorney for Plaintiff  
33 ADRIANNE DESANTIS

34 //

35 //


1 Dated: 1/3/08

/s/  
CAROLINE L. FOWLER  
Assistant City Attorney  
Attorney for Defendants  
City of Santa Rosa, Edwin Flint, Chief of  
Police, Santa Rosa Police Officers Jerry  
Soares, Rich Celli, Travis Menke, and Patricia  
Mann

6 ORDER

7 Pursuant to the stipulation of the parties and for good cause shown, **IT IS SO ORDERED.**

8  
9 Dated: January 8, 2008

  
HONORABLE JEFFREY S. WHITE  
United States District Judge